

Dale Montgomery	)	
	)	Civil File No. 13-cv-2839- JNE/FLN
Plaintiff,	)	
	)	
v.	)	
	)	
Pinnacle Credit Services, LLC; Worldwide	)	
Recovery; Stephens & Michaels Associates	)	
Inc.; Royal Credit Union; Equable Ascent	)	
Financial; Verifacts Inc.; Cavalry Portfolio	)	
Svcs; Dynamic Recovery Services; NCO	)	
Financial System, Inc.; Law Office of Joel	)	
Cardis, LLC; North Shore Agency, Inc.;	)	
Transworld Systems Inc.; Worldwide	)	
Recovery Specialists Inc,	)	
	)	
Defendants.	)	

PLEASE TAKE NOTICE that, on January 17, 2014, at 9:30 a.m., before Magistrate Judge Franklin L. Noel, Courtroom 12W, United States Courthouse, 300 South Fourth Street, Minneapolis, MN 55145, or as soon thereafter as counsel may be heard, Defendant Equable Ascent Financial ("EAF"), by and through its attorney, will, pursuant to Fed. R. Civ. P. 60(b), move the Court for an Order granting Defendant EAF relief from the default judgment (Doc. 31) entered on November 21, 2013.

Dated: December 6, 2013.

HINSHAW & CULBERTSON LLP

By: s/Michael T. Berger  
Michael T. Berger Reg. No. 350679  
333 South Seventh Street, Suite 2000  
Minneapolis, MN 55402  
Telephone: 612-333-3434  
Fax: 612-334-8888  
mberger@hinshawlaw.com

ATTORNEYS FOR DEFENDANT EQUABLE  
ASCENT FINANCIAL